

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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| <p>THOMAS GORCZYNSKI, <i>Individually and on behalf of others similarly situated,</i></p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ELECTROLUX HOME PRODUCTS,<br/>INC., et al.,</p> <p style="text-align: center;">Defendants.</p> | <p>Case No. 1:18-cv-10661-RMB-AMD</p> <p><b>CERTIFICATION OF SIMON BAHNE PARIS, ESQ. IN SUPPORT OF APPLICATION TO ADMIT RAINA C. BORRELLI, ESQ. PRO HAC VICE</b></p> |
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SIMON BAHNE PARIS, of full age, certifies as follows:

1. I am a member of the firm Saltz, Mongeluzzi & Bendesky, PC, attorneys for Plaintiffs in the above matter. I am fully familiar with the facts set forth herein and make this Certification in support of Plaintiffs' application to admit Raina C. Borrelli, Esq. *pro hac vice* pursuant to Local Civil Rule 101.1.

2. My firm has offices located at, One Liberty Place, 1650 Market Street, 52nd Floor, Philadelphia, PA 19103.

3. I am a member in good standing of the bar of the State of New Jersey and of the United States District Court for the District of New Jersey.

4. Mrs. Borrelli is a member of the law firm of Gustafson Gluek PLLC, located at Canadian Pacific Plaza, 120 South Sixth Street, Suite 2600, Minneapolis, MN 55402.

5. Mrs. Borrelli has advised me that he is a member in good standing of the bar of each jurisdiction in which he is admitted to practice law.

6. I am not aware of any disciplinary action ever having been taken against Mrs. Borrelli and believe he is a worthy candidate for admission to the bar of this Court *pro hac*

*vice.*

7. Plaintiffs have requested that Mrs. Borrelli be admitted *pro hac vice* for this matter because of his particular experience in the relevant areas of law and detailed knowledge of the facts and issues in this matter.

8. I have fully informed Mrs. Borrelli of the requirements of this Court upon attorneys admitted *pro hac vice* under Local Civil Rule 101.1(c). I am also aware of the requirements imposed upon me by this Court as the attorney making the instant application. I understand that I will be responsible for the actions of Mrs. Borrelli in connection with his *pro hac vice* admittance to this Court.

9. Mrs. Borrelli has been informed that he must pay the required fee into the New Jersey Lawyer's Fund for Client Protection upon admission *pro hac vice*, and the required fee to this Court.

10. I will sign all documents filed with the Court, appear at all hearings, and accept service of all notices, orders, and pleadings in this action unless the Court excuses me from same pursuant to Local Civil Rule 101.1(c)(4).

11. I have received consent of opposing counsel to file this *pro hac vice* application on behalf of Raina C. Borrelli, Esq.

12. I will make all necessary good faith efforts to ensure that Mrs. Borrelli will comply with the requirements outlined in Local Civil Rule 101.1(c).

13. I respectfully request that Plaintiffs' application to admit Raina C. Borrelli, Esq. *pro hac vice* be granted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 13, 2020

/s/ Simon Bahne Paris  
Simon Bahne Paris